

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC  
REPAIR SYSTEM PRODUCTS  
LIABILITY LITIGATION**

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**THIS DOCUMENT RELATES TO:**

*Marilyn Clark and James Lee Clark v.  
Ethicon, Inc., et al.*

**Case No. 2:16-cv-00324**

**Master File No. 2:12-MD-02327  
MDL No. 2327**

**JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE**

**PLAINTIFFS' DESIGNATION AND  
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 320, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

**RETAINED EXPERT WITNESSES**

- 1) Brian Raybon, MD (Urogynecologist) (adoption of previously served reports)  
79 Doyle Street  
Toccoa, GA 30577
- 2) Michael Thomas Margolis (Urogynecologist) (adoption of previously served reports)  
Bay Area Pelvic Surgery  
1820 Ogden Dr.  
Burlingame, California 94010
- 3) Scott Guelcher, PhD (Materials) (adoption of previously served reports)  
Polymer and Chemical Technologies, LLC  
1008 Caldwell Avenue  
Nashville, TN 37204


- 4) Suzanne Parisian, MD (Regulatory) (adoption of previously served reports)  
MD Assist, Inc.  
7117 N. 3<sup>rd</sup> Street  
Phoenix, AZ 85020
- 5) Kevin Jovanovic, MD, FACOG, FACS  
930 Fifth Avenue, Suite 3  
New York, NY 10021

A General Designation and Disclosure has been or is being served by and on behalf of the wave 10 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

Respectfully submitted,

**KLINE & SPECTER, PC**

BY:

  
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Dated: May 24, 2019

**IN THE UNITED STATES DISTRICT COURT  
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**CERTIFICATE OF SERVICE OF PLAINTIFF'S DESIGNATION AND DISCLOSURE  
OF GENERAL AND CASE-SPECIFIC EXPERT WITNESSES**

I hereby certify that on May 24, 2019, I electronically served Plaintiff's Designation and Disclosure of General and Case-Specific Expert Witnesses on counsel of record.

**KLINE & SPECTER, PC**

BY:

  
\_\_\_\_\_  
LEE B. BALEFSKY, ESQUIRE  
CHRISTOPHER A. GOMEZ, ESQUIRE  
*Attorneys for Plaintiffs*